

Dahiya Law Offices LLC
350 Broadway Suite 412
New York New York 10013
Tel: 212 766 8000
Fax: 212 766 8001

Hon. Elizabeth Stong
United States Bankruptcy Judge
Eastern District of New York
Brooklyn, New York 11201
Fax: 347 394 1865

June 8, 2012

Kramer as Trustee of the Estate of Shahara Khan v. Mahia et al
Case No. 11-01520-ESS.

Hon. Judge Stong:

I appeared for the defendant, Tozammel Mahia, before substitution by Ms. Christine T. Castiglia-Rubsentein, Esq. In this case, the Plaintiff Ms. Debra Kramer had twice requested extension of time to file answer which I readily agreed. However I made my first request to her today which was denied.

Owing to a personal loss, I had a breakdown which demanded that I seek immediate medical attention. I am currently seeing a psychologist who has referred me to the psychiatrist. This is taking significant time and as negatively affected my ability to focus on the case at this time. I expect to be able to properly prepare for the motion hearing and brief the court as ordered. I am seeking this extension a week before the hearing, because I had thought that I would be able to prepare for the matter and file requisite additional paperwork. In addition, there are four pending appeals for other clients that I must also prepare for. I am also trying to engage a lawyer who will represent me in this matter whom I can afford to retain. At present I do not have significant financial resources; for example, in this matter I was only paid a retainer of \$250 (Two Hundred and Fifty Dollars) by the defendant. Defendant had stated that they could not afford anymore to start defending the case.

In this case, granting the extension of time will not prejudice any party to this matter as the defendant has a new counsel and the underlying case would proceed unhindered. Accordingly, I am requesting that the court grant me a new hearing date 45 days from the currently scheduled date of June 13th, 2012. This would enable me to properly prepare and file the necessary paperwork in reference to this matter under 28 U.S.C. 1927. The issues raised in this matter are of very vital importance to both the consumer bar and debtors at large.

I thank you in advance for your understanding.

Yours sincerely,



Karamvir Dahiya, Esq.